

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DAVID KANEFSKY, Individually and  
On Behalf of All Others Similarly  
Situated,

Plaintiff,

V.

HONEYWELL INTERNATIONAL INC.,  
et al.

Defendants.

No. 2:18-cv-15536-WJM-JSA

Hon. William J. Martini

Hearing date: May 3, 2022

**DECLARATION OF JOSEPH MAHAN REGARDING  
(A) MAILING OF POSTCARD NOTICE; (B) PUBLICATION OF  
SUMMARY NOTICE; (C) CALL CENTER SERVICES; (D) POSTING OF  
NOTICE AND CLAIM FORM ON SETTLEMENT WEBSITE;  
(E) REPORT ON OBJECTIONS OR REQUESTS FOR EXCLUSION  
RECEIVED TO DATE; AND (F) CLAIMS RECEIVED TO DATE**

I, Joseph Mahan, hereby declare as follows:

1. I am a Settlement Project Manager at Epiq Class Action and Claims Solution, Inc. (“Epiq”). Pursuant to ¶ 7 of the Order Preliminarily Approving Settlement and Providing for Notice of Pendency dated January 18, 2022 (“Preliminary Approval Order”), Epiq was appointed as the Claims Administrator to supervise and administer the notice procedure as well as the processing of claims in connection with the settlement (the “Settlement”) of the above-captioned action (the “Action”). I have the responsibility for overseeing all aspects of the notice and claims administration services performed by Epiq with respect to the Settlement.

2. I respectfully submit this Declaration in order to provide the Court with information regarding, among other things: (1) the mailing of the Postcard Notice (the “Postcard Notice”); (2) the publication of the Summary Notice; and (3) the establishment of the website and toll-free number dedicated to this class action, in accordance with the Preliminary Approval Order. I am over 21 years of age and am not a party to this Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

### **MAILING OF THE POSTCARD NOTICE**

3. The Court’s Preliminary Approval Order required Epiq to, among other things, mail and email the Court-approved Postcard Notice (the “Postcard Notice”) to potential Class Members. *See* ECF No. 180-1.

4. Epiq maintains a proprietary database (the “Broker Database”) of 1,095 brokerage firms, banks and other financial institutions as published by Securities Dealers of North America, and The Depository Trust & Clearing Corporation (“DTC”) participant members to be used in notifying record holders of class actions.

5. On January 25, 2022, Epiq was provided with the record holder list and a list of DTC participant members relating to Honeywell International Inc. (“HON”) common stock purchased during the period from February 9, 2018 through October 19, 2018, inclusive. The electronic file contained the names and addresses of 3,489 potential Class Members.

6. Epiq entered the data referenced above into a segregated database (the “Epiq Mailing Database”) to be used for the mailing and emailing of the Postcard Notice to potential Class Members. On February 1, 2022, pursuant to ¶ 7 of the Preliminary Approval Order, Epiq caused the Postcard Notice to be mailed via the United States Postal Service (“USPS”) by first class mail, postage prepaid, to the 1,095 brokers and other nominees referred to in ¶ 4 above and 3,489 potential Class Members referred to in ¶ 5 above. Epiq mailed a total of 4,584 Postcard Notices in this initial mailing. In addition, Epiq emailed 55 Postcard Notices to the brokerage firms, banks and other financial institutions in which they had a valid email address on record.

7. As of April 26, 2022, in response to the Postcard Notice mailing, Epiq

has received bulk requests from brokers and other nominees for 237,247 Postcard Notices for them to forward to their customers. Epiq has also received an additional 267,363 names and addresses of potential Class Members from brokerage firms, banks, institutions and other nominees, in the form of disks, emails, labels and lists, requesting that the Postcard Notice be mailed to these individuals. Epiq is in the process of mailing a Postcard Notice to these additional records as well.

8. Epiq leases and maintains a Post Office Box (P.O. Box 5988, Portland, OR 97228-5988) for the receipt of all undeliverable mail and written communications necessary to implement the Settlement.

9. As of April 26, 2022, the USPS had returned approximately 7,488 Postcard Notices as undeliverable without forwarding addresses.

#### **PUBLICATION OF SUMMARY NOTICE**

10. On February 7, 2022, Epiq caused the Summary Notice to be published in *Investor's Business Daily* and *PR Newswire*. See ECF No. 180-1.

#### **CALL CENTER SERVICES**

11. Epiq reserved a toll-free phone number for the Settlement, (855) 604-1686, and published that toll-free number in the Postcard Notice, in the Summary Notice, and on the Settlement Website.

12. The toll-free number became operational on February 1, 2022. The toll-free number connects callers with an Interactive Voice Recording (“IVR”). The IVR provides potential Settlement Class Members and others who call the toll-free

telephone number access to additional information that has been pre-recorded. The toll-free telephone line with pre-recorded information is available 24 hours a day, 7 days a week. Specifically, the pre-recorded message provides callers with a brief summary of the Settlement and the option to select one of several more detailed recorded messages addressing frequently asked questions. The IVR also allows callers to request that a copy of the Notice Packet be mailed to them or the caller may opt to speak live with a trained operator. Callers are able to speak to a live operator regarding the status of the Settlement and/or obtain answers to questions they may have, Monday through Friday from 9:00 a.m. to 6:00 p.m. Eastern Time (excluding official holidays). During other hours, callers may leave a message for an agent to call them back. Epiq has promptly responded to each telephone inquiry and will continue to address potential Settlement Class Members' inquiries.

### **SETTLEMENT WEBSITE**

13. Pursuant to the Preliminary Approval Order, Epiq, in coordination with Co-Lead Counsel, designed, implemented and currently maintains a website dedicated to the Action ([www.HoneywellSecuritiesLitigation.com](http://www.HoneywellSecuritiesLitigation.com)) (the "Settlement Website"). The address for the Settlement Website is set forth in the Notice, Claim Form, and Summary Notice.

14. The Settlement Website became operational on February 1, 2022, and is accessible 24 hours a day, 7 days a week. Among other things, the Settlement

website includes information regarding the Action and the proposed Settlement, including the exclusion, objection, and claim-filing deadlines and the date and time of the Court's Settlement Hearing. In addition, copies of the Notice, Claim Form, Stipulation, Preliminary Approval Order, and other documents related to the Action are posted on the Settlement Website and are available for downloading. Epiq will continue operating, maintaining and, as appropriate, updating the Settlement Website until the conclusion of this administration.

**REQUESTS FOR EXCLUSION AND OBJECTIONS RECEIVED TO DATE**

15. The Notice, Summary Notice, and Settlement Website inform Settlement Class Members that requests for exclusion from the Settlement Class must be postmarked by April 4, 2022. The Notice directs Settlement Class Members who wish to request exclusion to mail their request to Honeywell Securities Litigation, Epiq Class Action and Claims Solutions, Inc., P.O. Box 5988, Portland, OR 97208-5988. The Notice also sets forth the information that must be included in each request for exclusion. Epiq monitors all mail delivered to this P.O. Box.

16. Pursuant to this Court's Order Preliminarily Approving Settlement and Providing for Notice, Class Members who wish to be excluded from the Class were required to do so in writing so that the request is postmarked by April 4, 2022. As of the date of this Declaration, Epiq has received eleven (11) requests for exclusion, which are attached hereto as Exhibit A.

17. The Notice, Summary Notice, and Settlement Website also inform Settlement Class Members that they may object to the Settlement, the proposed Plan of Allocation or Co-Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses; the objection must be in writing and filed with the Court and delivered to representatives of Co-Lead Counsel and Defendants' Counsel such that they are received on or before April 4, 2022.

18. Through April 4, 2022, Epiq has not been informed of any objections to the Settlement, the Plan of Allocation, or Co-Lead Counsel's motion for attorneys' fees and reimbursement of Litigation Expenses.

#### **CLAIMS RECEIVED TO DATE**

19. The deadline for submitting a Proof of Claim was April 4, 2022. As of April 26, 2022, Epiq has received approximately 97,825 Proofs of Claim. Of the Proofs of Claim received, approximately 5,011 were submitted via mail, and approximately 92,814 were submitted electronically through the Settlement website.

20. As Proofs of Claim are often submitted with incomplete information, not signed, not properly documented, and/or filed by claimants who are not Class Members, much of Epiq's efforts will involve extensive claimant communications so that all claimants have sufficient opportunity to cure any deficiencies and file a complete Proof of Claim. The deficiency process, which involves letters and emails to claimants, and inbound and outbound telephone calls or emails to claimants, is

intended to assist claimants in properly completing their otherwise deficient submissions in order to participate in the Settlement.

21. Epiq will work throughout the entire administration process to ensure that Proofs of Claim are processed properly; that deficiency and ineligibility conditions are identified and classified; that deficiency letters are mailed to the appropriate claimants; and that Epiq's computer programs are operating properly. Furthermore, Epiq's fraud prevention team, which includes highly qualified personnel with experience investigating fraud in both the public and private sectors, will use a variety of fraud protection controls throughout the administration process to identify potential fraudulent Proofs of Claim.

I declare under penalty of perjury that the foregoing facts are true and correct to the best of my knowledge.

Executed this 26th day of April, 2022, at Philadelphia, PA.

  
\_\_\_\_\_  
Joseph Mahan  
Epiq Class Action and Claims Solutions, Inc.



# Exhibit A

# Exclusion Request - 1

March 5, 2022

Honeywell Securities Litigation  
PO Box 5988  
Portland OR 97228-5988

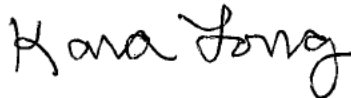
Re: Exclusion from the Class Action Settlement  
Kanevsky v. Honeywell International Inc., et al  
Case No. 2:18-cv-15536-WJM-JSA (D.N.J.)

We are requesting exclusion for the estate of Arnold Lehmann, as the personal representatives of the estate, from the above named class action settlement.

Jon H. Lehmann & Kara D. Long Ex  
Est Arnold L. Lehmann  
PO Box [REDACTED]  
[REDACTED]

Holder Account Number:  
[REDACTED]

Sincerely,



Kara Long, Personal Representative  
Jon Lehmann, Personal Representative (approved telephonically)  
PO Box [REDACTED]  
[REDACTED]

## Exclusion Request - 2

MAR 09 2022

March 5, 2022

This document was received  
in the same envelope as the  
previously labeled document  
**Document Control**

Honeywell Securities Litigation  
PO Box 5988  
Portland OR 97228-5988

Re: Exclusion from the Class Action Settlement  
Kanevsky v. Honeywell International Inc., et al  
Case No. 2:18-cv-15536-WJM-JSA (D.N.J.)

We are requesting exclusion on behalf of our father, Arnold Lehmann, as his representatives, from the above named class action settlement.

Arnold L. Lehmann  
PO Box [REDACTED]  
[REDACTED]

Holder Account Number:  
[REDACTED]

Sincerely,



Kara Long, Personal Representative  
Jon Lehmann, Personal Representative (approved telephonically)  
PO Box [REDACTED]  
[REDACTED]

# Exclusion Request - 3

  
**March 3, 2022**

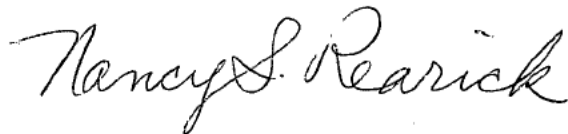
**Claims Administrator  
Honeywell Securities Litigation  
P.O. Box 5988  
Portland, OR 97228-5988**

**Dear Sir or Madam:**

**I request exclusion from the Class in Kanefsky v. Honeywell International Inc., et al, Civil Action No. 2:18-cv-15536. My 10 shares of stock were purchased 5/18/14 and were neither added to nor sold during the dates of 2/9/18 – 10/19/18.**

**My telephone # is:** 

**Very truly yours,**



**Nancy S. Rearick**

# Exclusion Request - 4



3-8-22

I wish to be excluded from  
this Honeywell Securities litigation.

Thank you

Glennia Cattermole

# Exclusion Request - 5

March 10, 2022

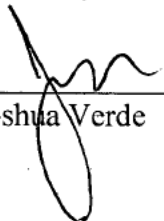
Honeywell Securities Litigation  
c/o Epiq Class Action and Claims Solutions, Inc.  
P.O. Box 5988  
Portland, OR 97228-5988

RE: 2:18-cv-15536-WJM-JSA (D.N.J.)

I request exclusion from the Class in *Kanefsky v. Honeywell International Inc., et al.*, Civil Action No. 2:18-cv-15536.

FMTCO CUST IRA SEPP  
FBO JOSHUA VERDE  


# of shares: 200 (Acquired 100 on 11/16/2016 and 100 on 02/05/2018)

  
\_\_\_\_\_  
Joshua Verde

# Exclusion Request - 6

# Honeywell Securities Litigation

I wish to be excluded  
from the Honeywell Securities  
Litigation

40 Shares of Honeywell  
Purchased

1. 25 Shares 6/9/2016 @ 115.57990
2. 15 Shares 12/26/2017 @ 153.7442

CAROLYN GARDINER

Carolyn Gardiner

# Exclusion Request - 7

March 24, 2022

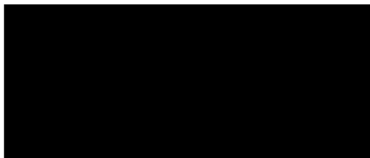
Honeywell Securities Litigation  
c/o Epiq Class Action and Claims Solutions, Inc.  
P.O. Box 5988  
Portland, OR 97228-5988

Dear Sirs:

I request exclusion from the Class in *Kanefsky v. Honeywell International Inc., et al.*, Civil Action No. 2:18-cv-15536.

Purchase/Sale of HON shares during the "Class Period": None

Joseph Schunk



Sincerely,

A handwritten signature in black ink that reads "Joseph Schunk". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joseph Schunk

# Exclusion Request - 8



Matthew Emerson Ph.D.



March 24, 2022

Honeywell Securities Litigation  
c/o Epiq Class Action and Claims Solutions, Inc.  
P.O. Box 5988  
Portland, OR 97228-5988

To whom it may concern,

I wish to request exclusion from the Class in Kanefsky v Honeywell International Inc. et al, Civil Action No. 2:18-cv-15536.

Here is the information for 2018 of Honeywell shares held/purchased from a Morgan Stanley fourth quarter account report.

**HONEYWELL INTERNATIONAL INC (HON) ( from Morgan Stanley statement 2018)**

Shares held	total cost	total market value
Total 96.469	2,224.68	12,745.48

Sincerely,

A handwritten signature in cursive script, appearing to read "Matthew Emerson".

Matthew Emerson

# Exclusion Request - 9

April 4, 2022

Honeywell Securities Litigation  
c/o Epiq Class Action and Claims Solutions, Inc.  
P.O. Box 5988  
Portland, OR 97228-5988

RE: Civil Action Number 2:18-cv-15536 - Exclusion

I request exclusion from the Class in Kanefsky v. Honeywell International Inc., et al., Civil Action Number 2:18-cv-15536.

I have not had the time to research my ownership and trading history for the stock in question. I believe I was not provided sufficient notice of the litigation and proposed settlement to accept the settlement and wish to retain my right to sue or seek other redress at any time in the future.

Ownership of shares in question was via an IRA held at Merrill Lynch during the time period indicated in the action.

GARY M. DURGIN (IRA)



A handwritten signature in black ink that reads "Gary M. Durgin" followed by a horizontal line.

# Exclusion Request - 10

DAVID M. GREEN



MARCH 28, 2022

Honeywell Securities Litigation  
c/o Epiq Class Action and Claims Solutions, Inc.  
P.O. Box 5988  
Portland, OR 97228-5988

To Whom It May Concern:


I hereby request exclusion from the Class in Kanefsky v. Honeywell International Inc., et al., Civil Action No. 2:18-cv-15536.

On August 6, 2018, I acquired 100 shares of Honeywell common stock at a price of \$148.90 and have held these shares since that date.


Your litigation notice was sent to me at:

David Mark Green



My telephone number is: 

Sincerely,



David M. Green

# Exclusion Request - 11

**COURT-ORDERED LEGAL  
NOTICE**

*Kanefsky v. Honeywell International  
Inc., et al.,*

Case No. 2:18-cv-15536-WJM-JSA  
(D.N.J.)

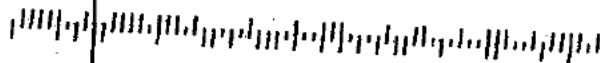
Your legal rights may be affected by  
this securities class action  
settlement. You may be eligible for a  
CASH payment. Please read it  
carefully.

For more information, please visit:  
[www.honeywellsecuritieslitigation.com](http://www.honeywellsecuritieslitigation.com);  
or email:  
[info@honeywellsecuritieslitigation.com](mailto:info@honeywellsecuritieslitigation.com);  
or call toll-free 855-604-1686

HONEYWELL SECURITIES LITIGATION  
P.O. BOX 5988  
PORTLAND, OR 97228-5988

PRESORTED FIRST CLASS  
U.S. POSTAGE PAID  
FARMINGDALE, NY  
PERMIT NO.225

CGH-IP1



Dear Sir: Concerning the lawsuit against  
Honeywell, Inc. I acquired only dividends  
during the stated period (Febr. 9 to Oct. 19, 2018).  
For ~~this~~ reason, I am opting out (excluding  
myself) from the Class.

Charles R. Maurer